

EXHIBIT 1

EXHIBIT 1

DECLARATION OF DEPUTY DISTRICT ATTORNEY LINDSAY L. LIDDELL
IN SUPPORT OF MOTION REGARDING DISCOVERY DISPUTE- RECORDING
DEPOSITIONS

STATE OF NEVADA
COUNTY OF WASHOE

I, Lindsay L. Liddell do hereby declare, under penalty of perjury, the following:

1. I am a Deputy District Attorney for the Washoe County District Attorney's Office. I am the primary attorney handling the defense for the Washoe County Defendants in *Drew Ribar v. Washoe County, Nevada et al.*, case no. 3:24-CV-00526-ART-CLB.

2. I attempted to meet-and-confer in good faith with Mr. Ribar on May 1, 2025. I requested a telephonic meet and confer on the issue of video or audio recording depositions, explaining that the rules and Standing Order require telephonic meet and confers, and providing him case law supporting County Defendants' position on prohibiting recording.

3. On May 5, 2025, Plaintiff acknowledged the meet and confer request, but stated he wished to discuss the matter via email, stated he would not "disseminate deposition recordings during litigation," but stated that his "intent to record depositions audiovisually under FRCP 30(b)(3) is for post-litigation publication as permitted by the Court, and to protect against false accusations, ensuring an accurate record of proceedings."

4. Based on this communication, I presumed Plaintiff declined to conduct a telephonic meet and confer, and clarified to Plaintiff that the Court did not *permit* deposition video publication. The parties are unable to reach an agreement on this issue, and thus County Defendants file the instant motion.


LINDSAY L. LIDDELL